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13 *Attorneys for Debtors and Reorganized Debtors*

14
15 **UNITED STATES BANKRUPTCY COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 **In re:**

Bankruptcy Case No. 19-30088 (DM)

19 **PG&E CORPORATION,**

Chapter 11

20 **- and -**

(Lead Case) (Jointly Administered)

21 **PACIFIC GAS AND ELECTRIC**
22 **COMPANY,**

Debtors. **DECLARATION OF RICHARD W. SLACK IN FURTHER SUPPORT OF REORGANIZED DEBTORS' FIFTEENTH SECURITIES CLAIMS OMNIBUS OBJECTION (SECURITIES ACQUIRED OUTSIDE SUBJECT PERIOD)**

23 Affects PG&E Corporation
24 Affects Pacific Gas and Electric
Company
25 Affects both Debtors

[Related to Docket Nos. 11343, 11520, 11638, 11809, 12057, 12394]

26 * *All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Date: June 7, 2022
Time: 10:00 a.m. (Pacific Time)
Place: (Tele/Videoconference Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 Pursuant to 28 U.S.C. § 1746, I, Richard W. Slack, hereby declare under penalty of perjury and
2 state as follows:

3 1. I am a member of Weil, Gotshal & Manges LLP, counsel for the debtors and reorganized
4 debtors in the above-captioned action (collectively, the “**Reorganized Debtors**”). I am admitted to this
5 Court *pro hac vice* and respectfully submit this declaration in further support of the *Reorganized
6 Debtors’ Fifteenth Securities Claims Omnibus Objection (Securities Acquired Outside Subject Period)*,
7 dated September 28, 2021 [Docket No. 11343] (the “**Objection**”).

8 2. Attached as **Exhibit A** is a true and correct copy of Claim No. 102822, received from
9 Franklin F. Oliveros and Zenaida C. Oliveros (the “**Claimants**”) on April 24, 2020.

10 3. Attached as **Exhibit B** is a true and correct copy of the informal response to the Objection
11 received from the Claimants on October 21, 2021 (the “**Response**”).

12 4. Attached as **Exhibit C** is a true and correct copy of the Reorganized Debtors’ reply letter
13 to the Response, dated January 19, 2022 (the “**Reply Letter**”).

14 5. Attached as **Exhibit D** is a true and correct copy of the Reorganized Debtors’ follow-up
15 letter to the Response, dated March 9, 2022 (the “**Follow-up Letter**”).

16
17 Executed: May 31, 2022

18 New York, New York

19
20 **WEIL, GOTSHAL & MANGES LLP**
KELLER BENVENUTTI KIM LLP

21
22 By: /s/ Richard W. Slack
Richard W. Slack

23
24 *Attorneys for Debtors and Reorganized Debtors*